



Holme Roberts & Owen LLP  
*Attorneys at Law*

COLORADO SPRINGS

May 9, 2007

***ELECTRONIC MAIL  
and FEDERAL EXPRESS:***

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LOS ANGELES

Re: USADA v. Floyd Landis; AAA No. 30 190 00847 06

MUNICH

Dear Panel Members:

SALT LAKE CITY

On April 13, 2007, USADA sought "the immediate intervention of the Panel, as detailed below, because the conduct of Mr. Landis and his advisors has reached a level that we respectfully submit threatens the integrity of the adjudication process." As the Panel will recall, USADA's letter concerned Respondent selectively leaking documents to the press in order to create favorable media stories, while at the same time holding USADA to a confidentiality obligation. The Panel will also recall that USADA's April 13th correspondence referenced the concern raised on the February 23, 2007, conference call with the Panel that someone on Respondent's team had potentially shown discovery documents to Michael Hiltzik of the Los Angeles Times.

SAN FRANCISCO

Unfortunately, it is now clear that the conduct that prompted USADA's previous submission has continued unchecked. The directives of the Panel with respect to the Motion in Limine request of Respondent were released yesterday to Mr. Hiltzik, and to NBC.Com. Attached as Exhibit A is Mr. Hiltzik's article

Matthew S. Barnett matthew.barnett@hro.com

90 South Cascade Avenue, Suite 1300 Colorado Springs, Colorado 80903-1615 tel 719.473.3800 fax 719.633.1518

#173074 v1

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Patrice M. Brunet, Esq.  
Richard H. McLaren, Esq.  
Christopher L. Campbell, Esq.  
May 9, 2007  
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indicating that not only had he been provided with Mr. Campbell's Dissent and Mr. Brunet's response, but it is also clear that discovery documents were also provided to Mr. Hiltzik. Hiltzik writes: "Documents provided to Landis by USADA indicate that LNDD was forced to reverse itself in at least one other case in 2006 because it mishandled an innocent athlete's sample. . . . The documents provided to Landis' attorneys appear to be identical to several that were made public last year... ." Further, Hiltzik quotes from Mr. Campbell's dissent and makes it clear that he received copies of Mr. Brunet's e-mail. ("According to an e-mail to the parties made available to the Times. . . .") Similarly the NBC.com article (attached as Exhibit B) quotes from all three of the Panel's directives on this issue and refers to documents "obtained Tuesday by NBCSports.com."

Accordingly, it is now clear that the media were provided with not only the orders of the Panel, but also with the documents produced during discovery in this case. The documents that were apparently provided to the media are attached as Exhibit C. Importantly, these documents are stamped "CONFIDENTIAL" and discuss cases involving other athletes.

While Mr. Suh attempted to argue to the Panel in his April 17th submission, that he was not prevented from sharing correspondence in this case, USADA has always maintained that the Panel's earlier orders did not allow the parties to unilaterally decide to release pleadings, correspondence and the directives of the Panel publicly. There can be no dispute that the Panel has been expressly clear that documents produced in discovery were not to be disclosed publicly: "In furtherance of the foregoing decisions, the Panel orders the parties to keep all documents confidential disclosed through the process of document discovery." (Procedural Order No. 1 at Paragraph 29.)

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May 9, 2007  
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Procedural Order No. 2, in response to Respondent's previous actions in providing documents to Mr. Hiltzik, further clarified the obligations of the parties:

In further support of the above quoted matters dealt with in Order No. 1 it is now apparent that it would be both advisable and necessary that there be some additional directions to augment and supplement those directions already found in Order No. 1. Therefore, the Panel directs that the parties' briefs, transcripts of the proceedings and procedural orders may not become public sooner than the first day of arbitration currently scheduled for 14 May 2007. Furthermore all of the foregoing confidentiality provisions are to be kept confidential by all persons who may have access to them by virtue of their consulting, agency or other relationship with the parties.

Procedural Order No. 2 at paragraph 7 (emphasis added).

It is now clear that if Mr. Hiltzik and NBC.com were provided the Panel's orders and the discovery documents by anyone connected to Mr. Landis that there has been a bold and egregious violation of the Panel's previous Orders.

USADA respectfully requests the Panel's consideration of the following points:

- The documents in question were only provided to Respondent and Panel Members.
- The Panel's Orders were only provided to the Parties.
- Mr. Hiltzik's access to Respondent's team is well established.

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Patrice M. Brunet, Esq.  
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May 9, 2007  
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- After the first release of witness names to Mr. Hiltzik by Respondent's team, Mr. Suh indicated that the release had occurred because there were "public relations folks involved in the case" and indicated that he would take personal responsibility for ensuring that "everybody involved abides by whatever concerns the Panel has." (See Transcript, 145:6 – 146:19.)
- Mr. Landis's public relations consultant, Mr. Henson is quoted in the NBC.com article.
- The release of information related to the case in order to create press headlines is entirely consistent with Respondent's conduct throughout this case.
- The documents could only have been provided by the Panel, USADA or Respondent.
- The professional conduct of the Panel in this proceeding is beyond question.
- USADA has no motivation to release these documents. Instead, USADA has adhered to the requirement of not commenting on this case in the press, a fact that does not appear to be in controversy.

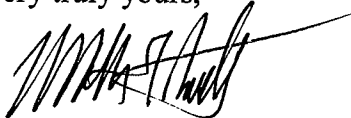
USADA's is concerned that there may be an effort underway to question the professionalism of the Panel in a transparent effort to compromise the integrity of these proceedings. To the extent that effort is underway, such conduct is clearly a personal affront to the character and professionalism of each of the Panel Members and every other professional involved in this process.

Holme Roberts & Owen LLP  
*Attorneys at Law*

Patrice M. Brunet, Esq.  
Richard H. McLaren, Esq.  
Christopher L. Campbell, Esq.  
May 9, 2007  
Page 5

Thank you in advance for your prompt consideration of this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "MSB", with a long horizontal flourish extending to the right.

Matthew S. Barnett

MSB

Enclosures

cc w/encs: Ms. Carmen Frobos (*via electronic mail*)  
Maurice M. Suh (*via electronic mail*)  
Howard Jacobs, Esq. (*via electronic mail*)

# **EXHIBIT A**



Los Angeles Times  
**latimes.com**



<http://www.latimes.com/sports/la-sp-landis9may09,1,2819199.story?ctrack=3&cset=true>

## Infighting revealed in Landis doping case

**Cyclist's arbitrator is excluded from deliberations on key ruling by two others on panel weighing doping allegations, raising fairness issues.**

By Michael A. Hiltzik  
Times Staff Writer

7:10 PM PDT, May 8, 2007

In a sign of a widening split on the arbitration panel overseeing the doping case against cyclist Floyd Landis, two of the arbitrators, including the one representing the prosecutors in the case, excluded Landis' arbitrator from their deliberations in a key ruling last week.

The excluded arbitrator, Bay Area attorney Christopher L. Campbell, vehemently protested in a written dissent that the others had not informed him they intended to confer on the matter before they issued the ruling May 1.

The "unprecedented and entirely inappropriate" action, Campbell wrote, "sends a clear message that the majority is unwilling to hear and consider valid arguments regarding a dispute."

Experts in arbitration law said Tuesday that the exclusion of one party's arbitrator from any deliberation is highly unusual and could raise doubts about the panel's commitment to fairness. "It's perplexing why the panel would not want to make sure every ounce of due process was afforded to Landis," said Robert G. Bailey, an arbitration expert at the University of Missouri School of Law.

But it is unclear whether that would be enough to persuade a civil court to review the case if the panel's ultimate decision goes against Landis.

Landis, the winner of the 2006 Tour de France, was charged with doping when a urine sample he provided during the race tested positive for the illicit administration of testosterone. He faces a two-year suspension and the loss of his Tour title if the charge is upheld by the arbitration panel and after an appeal.

The case is being prosecuted by the United States Anti-Doping Agency under the authority of the World Anti-Doping Agency. Besides Campbell, the arbitrators are Richard McLaren, a Montreal attorney appointed by USADA, and Patrice Brunet, a London, Ontario, attorney who was selected by McLaren and Campbell as the neutral arbitrator. None of the three would comment.

The dispute in the high-profile case has erupted as the panel prepares to take testimony at a hearing starting May 14. And it comes as Landis' attorneys step up their public attack on the integrity and competence of the Paris anti-doping lab that tested the sample underlying the doping charge. The core of the cyclist's defense is that the lab, known as LNDD, mishandled his sample and misinterpreted his test results.

Documents provided to Landis by USADA indicate that LNDD was forced to reverse itself in at least one other case in 2006 because it had mishandled an innocent athlete's sample.

According to the documents, the lab withdrew its finding that a competitive swimmer had doped with the steroid mesterolone after it discovered that the athlete's sample had been contaminated by steroids in another sample tested the same day. WADA rebuked the lab, demanding that it take corrective action.

The documents provided to Landis' attorneys appear to be identical to several that were made public last year by an anonymous source who had allegedly hacked into the lab's computers. USADA's delivery of the documents in the swimmer's case indicates that those, at least, are genuine.

At issue in the arbitrators' dispute are the results of tests of seven samples of Landis' urine taken at various points during the 2006 Tour de France. Unlike the sample that is the basis for the doping charge, these initially tested clean. USADA had asked the arbitrators' permission to test the samples again at the French lab.

Although Landis objected, the arbitrators ruled 2 to 1, with Campbell dissenting, to allow the further testing. But they also ruled that Landis could send his own experts to witness the procedure. Landis says USADA officials routinely prevented his experts from witnessing all facets of the retesting last month, however. Accordingly, his lawyers asked the arbitrators to rule the results inadmissible as evidence. The arbitrators instructed both sides to submit written briefs by May 1.

Campbell says that within hours of receiving the final brief, McLaren and Brunet privately drafted a ruling rejecting Landis' motion "without notice to me, my knowledge, or inclusion." He said he received the ruling by e-mail, as did the attorneys for Landis and USADA.

According to an e-mail to the parties made available to The Times, Brunet said he later informed Campbell that he had been excluded because Landis had merely ask the arbitrators to clarify their original order allowing the retests. Because Campbell did not join in the original order, Brunet argued, he had no right to participate.

Arbitration experts surveyed by The Times called that viewpoint novel but could not say whether it might lead a judge to invalidate any final ruling in the cyclist's case. Courts tend to give arbitrators great leeway to make their own rules, they said.

Even if Brunet's rationale were sound, said Stephen J. Ware, an arbitration expert at the University of Kansas, "best practices are that you should give the third arbitrator an opportunity to participate, just so you don't have questions after the fact."

*michael.hiltzik@latimes.com*



# **EXHIBIT B**



## Arbitrator calls ruling in Landis case 'inappropriate'

By Alan Abrahamson  
NBCSports.com

An "unprecedented and wholly inappropriate" pre-hearing ruling in Floyd Landis' doping case, according to one of the three arbitrators in the matter, "violates the notion of fundamental fairness" and should give Landis "cause for concern."

The blistering dissent, issued May 3 by arbitrator Christopher L. Campbell and obtained Tuesday by NBCSports.com, follows a ruling issued just two days earlier by the two other arbitrators in the case. The May 1 ruling, the latest in a sequence of complex legal and technical matters, relates to an ongoing dispute over expert review of the retesting of certain Landis urine samples.

The two other arbitrators, panel Chairman Patrice Brunet and Richard McLaren, issued the May 1 ruling without consulting Campbell, as Campbell's dissent and an e-mail issued later by Brunet make clear -- a move that raises questions of collegiality and, perhaps, more.

In his dissent, Campbell said the action "sends a clear message that the majority is unwilling to hear and consider valid arguments regarding a dispute," adding that it also "undermines the integrity" of the process.

The U.S. Anti-Doping Agency has accused Landis of doping in last year's Tour de France, alleging that he tested positive after the 17th stage of the 2006 Tour for an elevated testosterone to epitestosterone level. If found liable, he would be stripped of his Tour title and face a two-year suspension.

It remains unclear if the matter will affect or delay Landis' hearing, due to begin next Monday at Pepperdine University in Malibu, Calif. The disclosures Tuesday marked an unexpected turn in a case that has for months been litigated so aggressively it has at times seemed more a complex business dispute than a sports doping case. It also underscored a transparency atypical in most such sports doping matters.

USADA officials could not be reached Tuesday for comment. Michael Henson, Landis' spokesman, said the ruling "casts a shadow on the fairness of the proceeding." But he also said, "We just don't know if there's any recourse."

The issues that gave rise to the May 1 ruling and May 3 dissent revolve around the retesting of seven Landis urine samples from the 2006 Tour.

These, in doping parlance, are known as "B" samples. An athlete's urine is divided into two parts, the "A" and the "B." Typically, the "A" sample is tested first; if it shows irregularities, the "B" sample is then analyzed to confirm -- or not -- those irregularities.



Getty Images

It is unclear whether a new ruling will affect the U.S. doping case against Tour De France champion Floyd Landis.

Traditionally, a doping case could be made only with positive readings from both the "A" and "B" samples. But rulings in recent years have given anti-doping authorities greater leeway to make a case against an athlete based on more than just a positive test -- to present a wide range of evidence that might be relevant.

Accordingly, earlier this year, USADA asked the three-member arbitration panel for permission to retest the seven 2006 Tour samples, saying it wanted to see whether a sophisticated test could turn up evidence in those samples of synthetic testosterone -- not to make a positive test, which it could not do without "A" samples, but with the aim of turning up more evidence that might add weight to the case against Landis.

The "A" samples, which had turned up negative, were for the most part used up. But the "B" samples were readily available, at the French anti-doping lab, outside Paris.

The thrust of Landis' defense is that results from the French lab have proven unreliable. Landis argued that retests, if there were to be any, ought to be done at UCLA, not in France.

As in all doping cases that go to hearing, the defense picks one member of the arbitration panel, USADA picks another; the two chosen arbitrators are supposed to then get together and pick the chairperson. Landis had picked Campbell; USADA, McLaren. Then, though, they could not agree on a chair; Brunet finally emerged as a compromise choice.

On March 17, by a 2-1 decision, Campbell dissenting, permission to retest -- at the French lab -- was given. The majority, Brunet and McLaren, said the appointment of an independent expert ought to allay concerns of procedures at the French lab.

The retesting took place beginning April 16, at the French lab. Meanwhile, an

independent expert, whose identity has not been publicly disclosed, was appointed April 19 to review electronic data files from the Stage 17 tests. It remains unclear whether that expert is also due to oversee the retesting process. At any rate, no independent expert appeared at the French lab during the retests.

In a separate but related matter that has proven contentious, a Landis defense expert was kept out of the lab during the re-tests of three of the seven samples. Not unexpectedly, the Landis camp took issue with the retesting procedures.

Brunet issued the May 1 ruling rejecting Landis' complaints about those procedures. It went out by e-mail at 5:12 a.m.; it's not clear what time zone that refers to. At any rate, USADA had filed its brief on the issue just hours before, Campbell would later point out. The May 1 order says, among other things, that the majority ruling permitting retesting did not say the B samples "were to be analyzed in the presence of the panel's expert" -- meaning, apparently, that the expert did not have to be on hand for the retesting procedures to be considered valid.

How, then, to assure validity? The panel-appointed expert will "advise whether the lab's methodologies are flawed," and that "represents an adequate protection" to Landis, according to the ruling.

Campbell, in his May 3 dissent, said he had no idea the ruling was coming; he learned of it, he said, only when he read his e-mails that morning.

Brunet, in another e-mail sent at 6:13 p.m. on the 3rd, said that the panel has "always worked collaboratively." In this instance, he said, it "naturally flows that only the authors can interpret their own statements," and thus only he and McLaren took part in the May 1 ruling.

Campbell called it a "rush to judgment."

*Alan Abrahamson covers the Olympics and the sports world for NBCSports.com. Considered among the world's leading reporters on the Olympics, he spent 17 years at the Los Angeles Times and has been honored with a number of awards, among them the 2001 Associated Press Sports Editors' first-place prize for enterprise reporting and the 2002 National Headliner Award for sports writing. In 2004, he was named the sole U.S. winner of the International Olympic Committee's "Sport and Media Award."*

*E-mail: [alan.abrahamson@nbcuni.com](mailto:alan.abrahamson@nbcuni.com). **Archived stories***

# **EXHIBIT C**



**WORLD  
ANTI-DOPING  
AGENCY**  
play true

# CONFIDENTIAL

SENT BY E-MAIL: [Direction@lndd.com](mailto:Direction@lndd.com)

Montreal, September 1<sup>st</sup>, 2006

Pr. Jacques de Ceaurriz, Directeur  
Laboratoire National de Dépistage du Dopage  
143 Avenue Roger-Salengro,  
92290 CHÂTENAY-MALABRY  
France

Dear Pr. de Ceaurriz,

The World Anti-Doping Agency has been informed by the Fédération Internationale de Natation, that the re analysis of sample no. 336186 (Rapport d'Analyse # 28236) did not confirm the results of the initial A sample analysis initially returned (Rapport d'Analyse # 28112) as an adverse analytical finding for a metabolite of Mesterolone.

We have taken note of your report to FINA that such results were related to a contamination of blank urinary samples.

In order to investigate the nature of this discrepancy, WADA would like to receive further explanations on the nature of the contamination of the blank urine samples, as well as all the relevant information (Documentation packages, Certificates of Analysis, QC results,..) generated for this A sample analysis, and in support of your conclusions.

Please send this information to my attention at WADA as soon as possible.

Should you need further information, please do not hesitate to contact me.

Yours truly,

Dr. Olivier Rabin  
Director, Science  
World Anti-Doping Agency

World Anti-Doping Agency  
Stock Exchange Tower  
800 Place Victoria  
Suite 1700  
PO Box 120  
Montreal (Quebec) H4Z 1B7  
Canada

Phone: + 1 514 904 9232  
Fax: + 1 514 904 8650  
[www.wada-ama.org](http://www.wada-ama.org)

LNDD0485

Châtenay-Malabry, le 8 septembre 2006

Olivier RABIN  
WADA  
Stock exchange Tower  
800 place Victoria  
Suite 1700  
PO BOX 120 Montréal (Québec) H4Z1B7  
CANADA

Dear M. RABIN,

In reply to your letter on 1st September 2006, please find here our analytical documentation on sample n° 336186 (analysis reports n° 28112 and n° 28236)

Page 1 related to the screening data where a detection window is currently open for the main metabolite of Mesterolone (M2 metabolite).

Pages 2 and 3 related to the blank urines associated with the test sample for confirmation.

Pages 4 to 7 related to the test sample n° 336186 and to the reference of Mesterolone metabolites (M1 and M2).

Pages 8 related to the result on sample n° 336186 and indicated the presence of the metabolite M1 in the sample.

The analysis report n° 28112 was established on the basis of this result (page 23).

However, the result was reconsidered, first because the metabolite monitored in the screening step was different from that involved in the confirmation step, secondly because another sample n° 337671 which was confirmed to be positive for Mesterolone (metabolite M2) has been prepared and analyzed the same day, just before sample n° 336186 (see pages 18 to 21).

1/2

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1/2

Reconsideration consisted in checking the stored data for the presence of metabolite M1 in the screening experiment (page 9) and the presence of this metabolite in the blank urines from the confirmation step (pages 10 to 13).

The M1 metabolite was not found to be present in the screening experiment but was found to be present in the blank urines from the confirmation experiment. On the basis of this retrospective checking, we decided to perform reanalysis of sample n° 336186 (pages 14 to 17). The presence of the M1 metabolite of Mesterolone in the sample n° 336186 was excluded and a new analysis report n° 28236 was established as a substitute for report n° 28112 (pages 23 and 24).

Contamination of sample n° 336186 during the confirmation step was highly suspected because the corresponding blank urines were contaminated and because the confirmation experiment for sample n° 336186 was performed the same day as for sample n° 337671 which was found to contain high levels of Mesterolone metabolite (pages 21 and 22).

Please, note that the blank urines related the confirmation with sample n° 337671 were found to be free from contamination (pages 25 and 26)

Sincerely yours,

J. de CEAT/PRIZ  
Directeur



2/2





**CONFIDENTIAL**

SENT BY E-MAIL: [Direction@lndd.com](mailto:Direction@lndd.com)  
Montreal, September 18<sup>th</sup>, 2006

Pr. Jacques de Ceaurriz, Directeur  
Laboratoire National de Dépistage du Dopage  
143 Avenue Roger-Salengro,  
92290 CHÂTENAY-MALABRY  
France

Dear Pr. de Ceaurriz,

Thank you for providing the documentation on the screen, A confirmation and A re-analysis data of sample no. 336186 related to metabolite(s) of mesterolone. After careful review of this data, we would appreciate receiving further information in order to fully understand the issue(s) related to this case.

- Please provide any information from your investigation that would address the apparent presence of mesterolone metabolite 2 in the screening data.
- Please provide the circumstances that triggered the retrospective analysis of the screen and confirmation data after the adverse analytical finding had been reported.
- Please detail the data review process prior to reporting the A finding.
- Please also provide the laboratory procedure(s)/criteria in identifying and reporting a mesterolone case.
- In addition, it would be helpful if following data could be provided for the screen and the A confirmation:
  - o ISTD, mesterolone M1, mesterolone M2 chromatograms/spectra for:
    - Negative control(s);
    - Positive control(s) and;
    - Sample 336186
- Detailed explanations and reasoning leading to the conclusion of contaminated blanks is also needed.

Please send this information to my attention at WADA as soon as possible.

Should you need further information, please do not hesitate to contact me.

Yours truly,

Dr. Olivier Rabin  
Director, Science  
World Anti-Doping Agency

World Anti-Doping Agency  
Stock Exchange Tower  
800 Place Victoria  
Suite 1700  
PO Box 120  
Montreal (Quebec) H4Z 1B7  
Canada

Phone: + 1 514 904 9232  
Fax: + 1 514 904 8650  
[www.wada-ama.org](http://www.wada-ama.org)

LNDD0488

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Châtenay-Malabry, the 25th October 2006

Olivier RABIN  
WADA  
Stock exchange Tower  
800 place Victoria  
Suite 1700  
PO BOX 120 Montréal (Québec) H4Z1B7  
CANADA

Dear Doctor olivier RABIN,

We are sending you today by express mail a full documentation on sample 90/05\_336186 and sample 89/05\_337671 in relation to Mesterolone (red documents).

Both samples were present in the same batch for screening analysis and were analyzed the same day for confirmation. You will also find here the synthesis of the data (green documents) showing that pollution occurred at the screening level and that the blank urines were polluted at the confirmation step.

The main correction was to formalize the checking of blank urines on the result form according to the new version with is attached to this letter.

Best regards,

  
J. de CEJARRIZ  
Director

# CONFIDENTIAL



**WORLD  
ANTI-DOPING  
AGENCY.**  
play true

SENT BY E-MAIL: [Direction@lndd.com](mailto:Direction@lndd.com)

Montreal, December 09<sup>th</sup>, 2006

Pr. Jacques de Ceaurriz, Directeur  
Laboratoire National de Dépistage du Dopage  
143 Avenue Roger-Salengro,  
92290 CHÂTENAY-MALABRY  
France

Dear Pr. de Ceaurriz,

Thank you for providing further documentation on the screen, A confirmation and A re-analysis data of sample no. 336186 related to metabolite(s) of mesterolone.

In relation to the screening data, the conclusion that cross contamination from sample number 337671 to sample number 336186 occurred due to the automated SPE extraction (which utilizes the same needle every fourth sample) offers a plausible explanation for the screen results of 336186.

However, in regards to the first A confirmation for sample 336186, several critical issues remain to be explained. Therefore, we would appreciate receiving further information in order to fully understand the issue(s) related to this case:

- o Please provide further details on how the investigation addressed the cross contamination in the A confirmation, especially considering that the contamination seemed to involve different mesterolone metabolites in the screening and confirmation procedures. If the contamination is related, as suspected, to the conception of the analytical equipment, why such issue has not been observed before?
- o In addition, the data from the A confirmation seemed to identify an interference peak that contained the same spectrum ions as mesterolone M2 but at a later retention time. Did this interference have any influence in the decisions made in regards to the original reviews of the screen and confirmation data?

World Anti-Doping Agency  
Stock Exchange Tower  
800 Place Victoria  
Suite 1700  
PO Box 120  
Montreal (Quebec) H4Z 1B7  
Canada

Phone: + 1 514 904 9232  
Fax: + 1 514 904 8650  
[www.wada-ama.org](http://www.wada-ama.org)

87.49

LNDD0490

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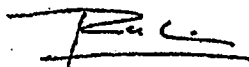
- 2 -

You will find enclosed the WADA Corrective Action Report Template that has been created to document summary explanations of corrective actions taken by the laboratories. The WADA Laboratory Committee requests that the attached report template be filled out and submitted to WADA in relation to this investigation. Please detail the corrective and preventive actions taken in this regard in the attached form. It is strongly considered that the issue of identifying different metabolites of mesterolone in the screen and confirmation should be addressed.

Please send the requested information to my attention at your earliest convenience.

Should you need further information, please do not hesitate to contact me.

Yours truly,



Dr. Olivier Rabin  
Director, Science  
World Anti-Doping Agency

LNDD0491

# CONFIDENTIAL



Châtenay-Malabry, the 15th December 2006

## TRANSMISSION DE TELECOPIE

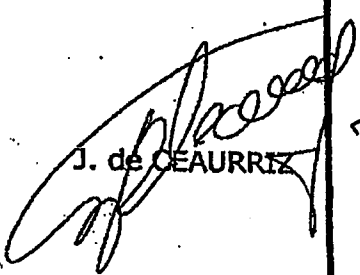
<b>Expéditeur :</b>  J. de CEARRIZ Directeur du Département des Analyses  Tél : +33 (0) 1.46.60.28.69 Fax : +33 (0) 1.46.60.30.17 e-mail : direction@lndd.com	<b>Destinataire :</b>  O. RABIN <b>Organisme :</b>  AMA  Fax : 00.1.514.904.87.69
--	--

Nombre de pages y compris celle-ci : 4

Dear Dr. RABIN,

Please, find here the WADA corrective actions report and the preventive action included in our confirmation result support.

Best regards,

  
J. de CEARRIZ

# CONFIDENTIAL



SENT BY E-MAIL:  
[analyses@afid.fr](mailto:analyses@afid.fr)

Montreal, March 15<sup>th</sup>, 2007

Pr. Jacques de Ceaurriz, Directeur  
Laboratoire National de Dépistage du Dopage  
143 Avenue Roger-Salengro,  
92290 CHÂTENAY-MALABRY  
France

Dear Pr. de Ceaurriz,

We take note of the corrective action report sent December 15<sup>th</sup>, 2006 detailing the case and actions taken related to the sample 336186. At its recent meeting in Berlin, the WADA Laboratory Committee reviewed the report and the issues surrounding this case and has requested that evidence be provided that the corrective action has been implemented into the laboratory standard operating procedure(s).

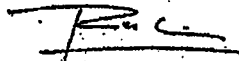
Please also confirm that appropriate remedial action has been incorporated into the laboratory's review process and that such remedial action takes place in reporting all adverse analytical findings as per ISL section 5.2.5.1. It is critical for this process to be able to identify such issues prior to reporting.

Thank you for your immediate attention to this matter.

Once the above information and confirmation of proper implementation of remedial actions have been provided to WADA, the review of this case will be considered closed.

Should you need further information, please do not hesitate to contact me.

Yours truly,



Dr. Olivier Rabin  
Director, Science  
World Anti-Doping Agency

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**CONFIDENTIAL**

Châtenay-Malabry, the 3<sup>rd</sup> April 2007

**Olivier RABIN**  
**WADA**  
Stock exchange Tower  
800 place Victoria  
Suite 1700  
PO BOX 120 Montréal (Québec) H4Z1B7  
CANADA

Dear Doctor RABIN,

In response to your letter on March 15<sup>th</sup>, 2007, I confirm that the appropriate remedial action that was announced in the "WADA program corrective action report" has been incorporated in our laboratory's review process as it can be seen from the enclosed laboratory documents.

Sincerely yours,

J. de CEABARRIZ  
Director

